

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ANTHONY WHITE,

Plaintiff,

v.

UNKNOWN OFFICERS and the CITY OF  
JOLIET,

Defendants.

JUDGE HIBBLER

No. 08-c-719

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**PLAINTIFF'S AGREED MOTION FOR LEAVE TO FILE AN AMENDED  
COMPLAINT**

NOW COMES Plaintiff, by and through his attorneys at Horwitz, Richardson & Baker LLC, and states the following in support of his Agreed Motion for Leave to Amend the Complaint.

**BACKGROUND**

Plaintiff filed his original complaint on January 31, 2008. The suit arose from the August 18, 2007 arrest of Plaintiff in which Plaintiff alleges he was wrongfully seized by Joliet Police Officers who used excessive force against Plaintiff resulting in physical injury to Plaintiff. The claims in Plaintiff's complaint included, false arrest, excessive force, conspiracy, deliberate indifference to medical needs, and state law claims for false arrest and battery.

The amendments to the complaint are simple; Plaintiff was unaware of the officer's names at the time of the filing of the complaint. Through discovery, Defendant City of Joliet tendered Internal Affairs Case No. 2007-055 to Plaintiff. Plaintiff received the disclosure on

June 9, 2008 and is now able to identify the officers. As such, Plaintiff now seeks leave from this Court to amend the complaint.<sup>1</sup>

The Defendant officers have been identified as LIEUTENANT ROECHNER #34, SGT. MICHAEL REILLY #61, SGT. STEFANSKI #82, OFFICER SAWYER #120, OFFICER KELLY #125, OFFICER PALMER #255, and OFFICER KILGORE #332. This information was obtained from the Internal Affairs Report tendered to Plaintiff by counsel for the City of Joliet.

WHEREFORE Plaintiff prays this Court grant his motion for leave to amend the complaint to include the identities of the officers, LIEUTENANT ROECHNER #34, SGT. MICHAEL REILLY #61, SGT. STEFANSKI #82, OFFICER SAWYER #120, OFFICER KELLY #125, OFFICER PALMER #255, and OFFICER KILGORE #332.

Respectfully Submitted.

s/ Erica Faaborg  
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<sup>1</sup> See Exhibit A, Amended Complaint.